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[Additional counsel appear on signature page]

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045 RFB-(PAL)

**PLAINTIFFS' STATEMENT OF
NON-OPPOSITION TO ZUFFA, LLC'S
MOTION TO SEAL (ECF NO. 552)**

1 Zuffa LLC's Motion to Seal its Replies in Support of Motions to Exclude the Testimony of Dr.
2 Hal Singer, Dr. Andrew Zimbalist, and Guy A. Davis under Fed. R. Evid. 702 and Daubert and Related
3 Materials (ECF No. 552, the "Motion to Seal") asks the Court to seal documents that have been
4 designated CONFIDENTIAL or HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY by Zuffa
5 or third parties, and portions of documents that refer to such documents and information, including
6 Zuffa's reply briefs in support of their motions to exclude testimony from Plaintiffs' experts Guy A.
7 Davis (ECF No. 547), Dr. Andrew Zimbalist (ECF No. 549), and Dr. Hal Singer (ECF No. 551). Zuffa
8 seeks to seal these documents on the basis that they purportedly contain highly confidential and
9 commercially sensitive information. Motion to Seal, at 3-5. Plaintiffs take no position at this time as to
10 whether the documents contain highly confidential or commercially sensitive information, and do not
11 oppose sealing the documents on the limited basis that they have been so designated by Zuffa or third
12 parties pursuant to Section 5 of the Revised Stipulation and Protective Order (the "Protective Order"),
13 signed by Magistrate Leen in this litigation on February 10, 2016. ECF No. 217. However, Plaintiffs
14 reserve their right to challenge any confidentiality designation pursuant to Section 6 of the Protective
15 Order, which states in relevant part, "[a]ny Party or Non-Party may challenge a designation of
16 'CONFIDENTIAL' or 'HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY' at any time."

1 Dated: May 21, 2018

Respectfully Submitted,

2 JOSEPH SAVERI LAW FIRM, INC.

3 By: /s/Kevin E. Rayhill
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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of May, 2018 a true and correct copy of **PLAINTIFFS' STATEMENT OF NON-OPPOSITION TO ZUFFA, LLC'S MOTION TO SEAL (ECF NO. 552)** was served via the District of Nevada's ECF system to all counsel of record who have enrolled in the ECF system.

By:

/s/ Kevin E. Rayhill